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July 1, 2024

## VIA ECF

The Honorable Dale E. Ho  
United States District Court  
Southern District of New York  
Thurgood Marshall U.S. Courthouse  
40 Foley Square  
New York, NY 10007

The Honorable Laura Taylor Swain  
United States District Court  
Southern District of New York  
Daniel Patrick Moynihan Courthouse  
500 Pearl Street  
New York, NY 10007

*Re: Doe v. Columbia University*, No. 23-cv-10393-DEH (S.D.N.Y.), *Doe v. Hunter*, No. 23-cv-10394-LTS (S.D.N.Y.), and *Doe v. Kachalia*, No. 23-cv-10395-DEH (S.D.N.Y.)

Dear Judge Ho and Judge Swain:

On behalf of Defendant Trustees of Columbia University in the City of New York (“Columbia”), we write to bring to the Court’s attention Plaintiff’s amended complaint in *Doe v. Hunter*, ECF 10, which names Columbia and several current and former Columbia administrators as defendants.<sup>1</sup> As a result, Columbia is now named as a defendant in all three of Plaintiff’s actions—*Doe v. Columbia*, *Doe v. Hunter*, and *Doe v. Kachalia*—two of which are currently designated as related.<sup>2</sup> See Loc. R 1.6; Rule 13, R. for Div. of Bus. Among Dist. Judges, S.D.N.Y.

When the complaints in these three actions were initially filed, *Doe v. Columbia* and *Doe v. Kachalia*—both of which named Columbia as a defendant—were designated as related. However, *Doe v. Hunter*—in which Columbia was not originally named as a defendant—was not designated as related, even though the facts in that case overlap with the facts in *Doe v. Columbia*. See *Doe v. Columbia*, ECF 17; compare Am. Compl., *Doe v. Hunter*, ECF 10, with Compl., *Doe v. Columbia*, ECF 1.

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<sup>1</sup> While Columbia is named as a defendant in the amended complaint in *Doe v. Hunter*, it has not been added as a defendant to any of the causes of action; only the current and former Columbia administrator defendants have been added to the causes of action. See *Doe v. Hunter*, ECF 10; see also *Triestman v. Fed. Bureau of Prisons*, 470 F.3d 471, 474 (2d Cir. 2006) (submissions of pro se litigants should be construed liberally).

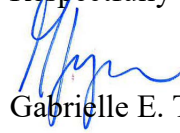
<sup>2</sup> As of the date of this letter, none of the Columbia defendants have been served in *Doe v. Hunter*.

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While Columbia respectfully submits that all three actions should be dismissed for all the reasons previously outlined for and by the Court, *see Doe v. Columbia*, ECF 17 & 29; *Doe v. Hunter*, ECF 5, to the extent the newly overlapping defendant (Columbia) in *Doe v. Hunter* bears on the relatedness of the cases, we wish to bring that information to the Court's attention. *See* Loc. R 1.6; Rule 13, R. for Div. of Bus. Among Dist. Judges, S.D.N.Y.

Respectfully submitted,



Gabrielle E. Tenzer

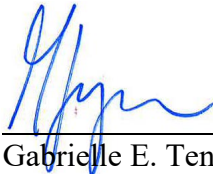
cc: Plaintiff John Doe (via mail & email)

**AFFIRMATION OF SERVICE**

I, Gabrielle E. Tenzer, declare under penalty of perjury that on July 1, 2024, I caused to be served a copy of this Letter via electronic and physical mail to the following addresses:

John Doe  
PO Box 209  
Buffalo, NY 14215  
jddoe591@gmail.com

Dated: July 1, 2024  
New York, New York

By:   
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